

KROTHAPALLI ET AL. -- 09/765,056
Client/Matter: 090933-0276149

IN THE DRAWING(S):

The attached substitute sheet of drawing(s) includes changes to Figure 2A and 2B. This sheet replaces the original sheet showing Figure(s) 2A, 2B and 2C.

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REMARKS

Applicant respectfully request reconsideration and allowance of the present application in view of the foregoing amendments and following remarks. By this Amendment, claims 23-38 have been added, including independent claim 23. The drawings and specification have also been amended to correct informalities. Claims 1-38 will be pending in the application, of which 1, 17, 22 and 23 are independent claims.

The specification stands objected to for various informalities. The specification has been amended as suggested in the Office Action, thus obviating the objections.

By this Amendment, Applicants have updated status of parent applications.

Additionally, the Office Action objected to missing reference numerals 200, 252 and 610 in the drawings. Accordingly, Applicants propose to conform Figures 2A and 2B to the specification by adding reference numerals 200 and 252A respectively. Additionally, the specification is modified to replace an incorrect reference numeral 610 to correctly identify parameters 410 of Figure 4. In view of these corrections, Applicants submit that the objections to the Specification should be withdrawn.

In this response, Applicants add new claims 23-38. Claims 23-38 includes matter consistent with the specification.

In the office Action, claims 1-4, 6-7 and 9-22 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Pub. No. US 2002/0083095 by Wu et al (hereinafter Wu). Additionally, claims 1-22 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Pub. No. US 2001/0025309 by MacLeod Beck et al (hereinafter Beck).

In this response, Applicants argue the rejections on the merits. However, Applicants hereby reserve the right to further traverse the rejection, at some later point in the prosecution, by swearing behind the references cited in the Office Action.

Applicants respectfully submit that the Wu Application does not disclose each and every element of the claims in the present Application. Wu is directed to the secure storing of confidential information for use in E-Commerce (See [0013] – [0016]). Wu is not directed to an automated data entry method or system for limited capability devices.

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Regarding claims 1, 17 and 22, the Office Action states that Wu teaches a method for configuring a device's interaction with an application without using cookies. Applicants respectfully submit that this contention is incorrect. Wu provides for passing "cookies and potentially other data from the client computer system 14" ([0045] and [0047]), cookies stored by the client system ([0047]) and a client system providing partner site cookies ([0050]). Clearly then, Wu is directed to systems capable of supporting cookies and explicitly provides for storing cookies as part of the confidential information (see [0044] – [0045]).

Additionally, Wu provides that "[t]he client system 14 participates substantively in each communication transaction involving the information server system 22 and any of the partner site servers 16, 18, 20. With each data transaction, the client system 14 provides any applicable cookies stored by the client system to the information server system 22..." ([0047]). It is clear therefore, that Wu provides client systems with sufficient functionality to maintain cookies and actively participate in data transactions. The independent claims of the present Application are clearly distinguishable from Wu because these and new claims are directed to devices that do not inherently support cookies.

The Office Action also suggests that the entering, storing, and initiating of transactions claimed in the present application is anticipated by Wu. However, Wu relies on profiles that map data types, data formats, initiation modes and access rights by partner site ([0019] – [0020]). The present invention provides a more flexible approach that provides significant advantages over Wu in entering, storing and initiating because it does not require the use of such profiles and has broader application and does not require the identification and profiling of partner sites. Thus, the present invention addresses problems, including cookie-less transactions, that are different from Wu and unanticipated by Wu.

Therefore, for at least these reasons, Applicants respectfully submit that independent claims 1, 17 and 22 are patentable over Wu and the associated rejections should be withdrawn.

Claims 2-4, 6-7, 9-16 and 18-21 depend from independent claims 1 or 17 and are patentable for at least the foregoing reasons. Additionally, claims 2 and 3 are rejected in the Office Action as being anticipated by Wu's pre-deployment form creation process ([0018]). The Wu citation requires the generation of a form and mapping of fields within the form and does not disclose transmission of information to the device responsive to an automatic entry indicator as

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recited in claim 2, nor the rendering the information at the device as recited in claim 3. Claims 9, 10 and 11 stand rejected based on a recitation of E-commerce standards and flaws inherent in the E-commerce standards ([0013]). However, the cited passage does not anticipate providing information at the device, entering information before a transaction is initiated or initiating a transaction a second time as recited by claims 9, 10 and 11, respectively. Nor does Wu disclose an indicator based on a device identifier as recited in claim 15. Wu discloses authentication and encryption techniques that are used to protect stored confidential information based on user identification and cannot be said to anticipate the device identifier recited in claim 15.

Therefore, for at least these additional reasons, Applicants respectfully request withdrawal of the rejections of claims 2-4, 6-7, 9-16 and 18-21.

Applicants submit that the Beck Application does not disclose each and every element of the claims in the present Application. Beck is directed to the management of a multimedia call center providing self help and receiving various types of input (see [0025]). Beck is not directed to an automated data entry method or system for limited capability devices.

Regarding claims 1, 17 and 22, Beck does not provide for entering information that needs to be used each time a transaction...is performed. Instead, Beck discloses recording past transactions and communications with no suggestion that this information is necessarily used in subsequent transactions ([0061]). Nor does Beck provide for initiating or looking up. Beck instead is directed to providing background information to an agent for handling incoming requests in a call center. Beck does not provide a mechanism for retrieving information and automatically entering the information during a transaction with the application server. Beck is clearly directed to a "macro" level system of collecting, maintaining and delivering complete historical documents in a call center environment. The present application provides, *inter alia*, methods for facilitating the provision of information during a single transaction by automatic or controlled entry of information collected in previous similar transactions. As provided in claim 1, the device has limited capabilities including an inability to handle cookies. The Beck invention provides no solution for automating information entry in such devices and, therefore, cannot be said to anticipate each and every element of claim 1.

Therefore, for at least these reasons, Applicants respectfully submit that independent claims 1, 17 and 22 are patentable over Wu and the associated rejections should be withdrawn.

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Claims 2-4, 6-7, 9-16 and 18-21 depend from independent claims 1 or 17 and are patentable for at least the foregoing reasons.

Regarding claims 2-3 and 19-20, Beck does not teach the recited elements of, for example, automatic filling-in, automatic entry indicator and *visually* rendering. Beck, as cited, provides customization of windows ([0116-0117]) and rendering data for *storage* ([0169-170]). Because the recited elements are not present in Beck, claims 2 and 3 are allowable for at least these additional reasons.

Regarding claims 4 and 21, Beck provides a call center application in which access to mass data storage is provided based on the call function. Beck does not provide the accessing of information used in a transaction with a business logic server and transmitting the information directly to the business logic server when automatic submission is enabled as recited in claim 4. Neither does Beck provide an automatic entry indicator. Therefore, for at least these additional reasons, Beck cannot be said to anticipate all of the elements of claim 4, and the rejection should be withdrawn.

Regarding claims 9-13, 16 and 18, Beck does not provide the information recited in the present claims. Beck does not provide automatic filling of information required in a transaction where the information is derived from a previous transaction. Beck merely provides historical information that may be used to guide new interactions within a call center. Likewise, Beck's servers do not anticipate the application servers as recited in various of the claims. Therefore, Beck cannot be said to anticipate all of the elements of claims 9-13, 16 and 18 and the rejections of these claims should be withdrawn.

Regarding claims 6-7 and 14-15, Beck does not provide for automatic submission of information obtained from prior transactions during a subsequent transaction and does not provide for user initiation of the subsequent transactions. Nor does Beck provide indicators comprising device identifiers. Therefore, Beck cannot be said to anticipate all of the elements of claims 6-7, 14-15 and the rejections of these claims should be withdrawn.

In the Office Action, Claims 5 and 8 are rejected under 35 U.S.C. 103(a) as being unpatentable over Wu in view of Official Notice and over Beck in view of Official Notice.

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Applicants disagree that the concepts and advantages provided in claims 5 and 8 are well known or expected in the art. Applicants submit that the combination of providing vocal input to a device of limited capability such that the vocal input initiates automatic filling of documents with information obtained during prior similar transactions is indeed novel and unexpected. While voice response systems are known in the art for navigating menus in call centers, the presentation of information provided by embodiments of the present invention presents new and non-obvious combinations. Applicants therefore traverse the rejection and request withdrawal of the rejections of claims 5 and 8.

All objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition of allowance and a Notice to that effect is earnestly solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 502213. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Dated: April 8, 2005.

Respectfully submitted,

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